

# EXHIBIT C

(312) 862-2389  
marc.sernel@kirkland.com

www.kirkland.com

(312) 862-2200

April 8, 2010

**VIA E-MAIL**

Angela Verrecchio  
Akin Gump LLP  
Two Commerce Square  
2001 Market Street  
Suite 4100  
Philadelphia, PA 19104-2891

Re: *Centocor Ortho Biotech, Inc. v. Genentech, Inc.*, Case No. 08-cv-03573  
MRP

Dear Angie:

I write in response to your letter of late yesterday and to raise additional deposition scheduling issues. Genentech Inc. accepts April 20, 2010 as the date of Gordon Moore's deposition and April 21 as the date of Robert Bazemore's deposition. Furthermore, Genentech proposes the following deposition dates:

- L. Jeanne Perry - April 30, 2010 (Eugene, Oregon, starting at 1 PM)
- Daniel Yansura - April 20, 2010 (San Francisco)
- Tim Schwartz (30(b)(6) on licensing/royalty topics) - April 23, 2010 (San Francisco)
- Wendy Lee - April 27, 2010 (Culpepper, Virginia)
- William Holmes - April 30, 2010 (San Francisco)

Our offer of Mr. Schwartz on April 23 is for 1/2 day of deposition -- which should be more than enough time given the topics he will be offered on -- and assumes that you will only need 1/2 day with Dr. Sean Johnston that same day. We are still working to determine a deponent and date for sales and marketing-related topics, and also a date (during the last week in April) for Sharon Crane.

**KIRKLAND & ELLIS LLP**

Angela Verrecchio  
April 8, 2010  
Page 2

To date, Genentech has yet to receive any proposed dates within the fact discovery period from Centocor for the deposition of Joseph Wolk. Please also let us know what topics Mr. Bazemore will cover in Genentech's fifth Rule 30(b)(6) notice, and if anything less than all of them please identify other witness(es) and their date(s) immediately.<sup>1</sup>

Also, please find the attached deposition notices for Peter Daddona, David Knight, and Scott Siegel. Genentech also plans on serving subpoenas on Junming Le and Jan Vilcek. Please let us know tomorrow if you are representing either of these individuals and whether you are willing to accept service of on their behalf.

Best regards,

/s/ Marcus E. Sernel

Marcus E. Sernel, P.C.

cc: Dianne B. Elderkin, Esq. (delderkin@akingump.com)  
Steven D. Maslowski, Esq. (smaslowski@akingump.com)  
Barbara Mullin, Esq. (bmullin@akingump.com)  
Matthew Pearson, Esq. (mpearson@akingump.com)  
Bruce G. Chapman, Esq. (bchapman@cblh.com)  
David I. Gindler, Esq. (coh.centocor.team@irell.com)  
Daralyn J. Durie, Esq. (ddurie@durietangri.com)

---

<sup>1</sup> We have agreed to postpone scheduling depositions at this time for John Dingerdissen, David Fabbri and James Eckhardt.